ED 4		Work Assignment Number 3-34						
EPA	W	ork Assi	gnment		Other	Amendm	ent Number:	
Contract Number	Contract Pe	iod]1/19,	/2009 To	09/19/2	2014	Title of Work Assignr	nent/SF Site Nam	е
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Purpose. X Work Assignment		Wa	ork Assignment (Close-Out		Period of Performant	ie.	
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Comments The purpose of this action of previously performed under W		Work Assig.	nment (WA)	3-34 white	å contin	es but does not	duplicate w	GH.K
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Project Officer Name Cheryl R. 3	Brown					nch/Mail Code:		
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(Signature)			(f)ate	7)		X Number:		
Other Agency Official Name					-	nch/Mail Code:		
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Work Assignment Form. (WebForms v1.0)	('							

Work Assignment Statement of Work-Amended

Title: Evaluating the Effectiveness of VADEQ's Risk-Based Inspection Strategy

Contractor: IEe, Inc. Contract No.: EP-W-10-002

Work Assignment Number: 3-34

Phase 1:

Estimated Period of Performance: Date of issuance to November 18, 2011

Estimated Level of Effort: No Change

Phase 2:

Estimated Period of Performance November 19, 2011 to November 2012

Estimated Level of Effort: 555 hours
Amended Level of Effort: 312 hours

September 20, 2012 - November 18, 2012

Option Year 3 Hours - 97.20

Key EPA Personnel:

Work Assignment COR (WA COR): Britta Johnson

OP-OSEM-ESD 1807T

202-566-1465 202-566-2211

Contract Level COR: Cheryl R. Brown

CMG/OP (1805T) 202/566-0940 202/566-3001 (fax)

BACKGROUND AND PURPOSE:

Located within the Office of Policy (OP)'s Office of Strategic Environmental Management is the Evaluation Support Division (ESD). ESD's mission is to build the capacity of EPA staff and managers to conduct program evaluation activities throughout the Agency by providing technical support and training on program evaluation for EPA's national programs and regional offices. A crucial component in assessing the benefit of meeting goals, objectives, and sub-objectives is having measurable results.

As part of its effort to encourage the effective use of program evaluations throughout the Agency, ESD promotes program evaluation through a Program Evaluation Competition (PEC or Competition). This Competition is part of an ongoing, long-term effort to help build the capacity of headquarters and regional offices to evaluate activities and to improve measures of program

performance. This program evaluation project was chosen for support under the current Program Evaluation Competition sponsored by OP.

The purpose of this amendment is to conduct additional information gathering and in-depth analysis of specific media programs' (air, water & waste) performance data.

The Virginia Department of Environmental Quality (VADEQ) launched a three-year pilot in 2009 intended to assess alternative targeting methods for establishing annual inspection strategies utilizing flexibilities contained in the existing compliance Monitoing Strategy (CMS) process. VADEQ's Air Compliance, Water Compliance, and Resource Conservation and Recovery Act (RCRA) Subtitle C and D programs are participating in the pilot. The pilot also looks at more focused inspection activity and reporting for well-performing facilities in lieu of full Compliance Evaluation Inspections (CEIs). It is hoped that successful demonstration may lead to consideration of additional future flexibilities for compliance activities conducted by VADEQ.

Historically, VADEQ has followed the traditional CMS approach to inspection planning which is based primarily on facility size and classification as the means of establishing inspection frequencies. This traditional approach can, in some instances, result in large facilities with excellent compliance histories being inspected frequently with considerable staff resources and questionable environmental value-added. Conversely, smaller facilities or those with poor compliance records may not be inspected at an appropriate frequency to address potential environmental concerns in a timely fashion.

In practice, VADEQ has routinely exceeded the number of inspections required under CMS by 10-30 percent depending on the media program. For this study, VADEQ met the baseline CMS requirements while applying the Risk-Based Inspection Strategy (RBIS) approach to those facilities inspected above and beyond the CMS minimum.

The protocol for RBIS is comprised of five elements (compliance history, environmental sensitivity, agency exposure/sectors, multi-media applicability, and environmental excellence program participation) designed to identify those facilities that pose the greatest potential for environmental impact and therefore represent the most effective use of limited compliance resources. These elements are informed to be assessed by the experience of regional time who have intimate knowledge of the facilities and personnel operating them. Compliance Managers in each of VADEQ's seven regional offices play critical roles in identifying appropriate facilities to be inspected under RBIS.

The pilot was implemented through the Performance Partnership Agreement (PPA) between VADEQ and EPA Region III. The PPA is jointly managed by Region III's Office of Policy Management's Planning and Analysis Branch (PAB) and VADEQ's Office of Administration. The evaluation itself will a collaborative effort including ESD, PAB, Region III's Office of Enforcement, Compliance, and Environmental Justice (OECEJ), and VADEQ.

The primary purpose of this evaluation is to examine the effects of the alternative targeting methods for establishing annual inspection schedules utilizing flexibilities contained in

the existing CMS process on resource utilization and inspection targeting.

Quality Assurance (QA) Requirements

Check [] Yes or [X] NO, if the following statement is true or false. The Contractor shall submit a written Quality Assurance Project Plan for any project that is developing environmental measurements or a Quality Assurance Supplement to the Quality Management Plan for any project which generates environmental data using models with their technical proposal.

TASKS AND DELIVERABLES:

The work assignment (WA) Contracting Officer Representative (COR) will review all deliverables in draft form and provide revisions and/or comments to the contractor. The contractor shall prepare the final deliverables incorporating the WA COR's comments.

Contractor personnel shall at all times identify themselves as Contractor employees and shall not present themselves as EPA employees. Furthermore, they shall not represent the views of the U.S. Government, EPA, or its employees. In addition, the Contractor shall not engage in inherently governmental activities, including but not limited to actual determination of EPA policy and preparation of documents on EPA letterhead.

The Tasks in the work assignment will be completed in two phases. Phase I Tasks will be completed prior to November 18, 2011 and include Tasks 1 and 2. Phase II will be completed between November 19, 2011 and November 18, 2012 and will include all remaining Tasks.

The contractor shall not duplicate work performed in the previous work assignment

TASK 1: PREPARE WORKPLAN (COMPLETE)

The contractor shall prepare a workplan that addresses Phase 1 and 2 within 15 calendar days of receipt of a work assignment signed by the Contracting Officer (CO). The workplan shall outline, describe and include the technical approach, resources, timeline and due dates for deliverables, a detailed cost estimate by task and a staffing plan. The WA COR and the Contract Level COR and the CO will review the workplan. However, only the CO can approve/disapprove the workplan. The contractor shall prepare a revised workplan incorporating the Contracting Officer's comments, if required.

Deliverables and Schedule Under Task 1

1a. Workplan
 1b. Revised workplan
 Within 15 calendar days of receipt of work assignment.
 Within 7 calendar days of receipt of comments from the CO, if required.

NOTE REGARDING WORK ASSIGNMENT DELIVERABLES AND TECHNICAL DIRECTION:

The Work Assignment Contracting Officer's Representative (COR) is authorized to issue technical direction (TD) under this work assignment. The COR will follow-up all oral technical direction in writing within 5 days.

TASK 2: DOCUMENT REVIEW AND DESIGN METHODOLOGY (COMPLETE)

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10-11)]

REMAINS UNCHANGED

Phase II includes Tasks Task 3 and 4.

- TASK 3: INFORMATION GATHERING AND ANALYSIS (COMPLETE)
 [Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]
- 3-1 INFORMATION GATHERING. Under the amended WA, the contractor shall conduct additional information gathering to include separate analyses of the performance data for VA DEQ's Air, Water, and Waste programs.

The original work assignment assumed that a single analysis encompassing all media was desired. EPA has learned that the implementation of RBIS was significantly different across media. The amended WA shall be used to further the evaluation's understanding of the differences in how the RBIS pilot has been implemented in the different media programs and what implications this has for the overall effectiveness of the approach.

As with the original WA, the evaluation team will run queries and provide the contractor with the relevant data to analyze. The Contractor shall analyze the data in accordance with the final methodology (2-6b).

All other information under this task remains unchanged.

Deliverables and Schedule Under Task 3

Remains Unchanged

TASK 4: REPORTS (INCOMPLETE)

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10-11)]

- 4-1 REPORT OUTLINE. (COMPLETE) The contractor shall submit an annotated outline describing the contents of the draft and final report. This will serve as a roadmap for laying out the format of the report. This will be instrumental in organizing the format and flow of the document and outlining the "story" that the evaluation report will tell.
- 4-2 DRAFT REPORT (INCOMPLETE) In accordance with the evaluation methodology schedule, the contractor shall submit a draft report containing, the compilation, analysis, and presentation of information developed and gathered during the conduct of the evaluation. Specifically, the contractor shall include information obtained or developed in support of Tasks

- 2-1 through 3-2. For purposes of costing, the contractor shall assume that a sequence of a draft preliminary findings memorandum and two separate drafts of the report will be required.
- 4-3 FINAL REPORT (INCOMPLETE) The contractor shall provide a final report that reflects appropriate consideration of the Agency's comments on the draft report and of any comments received during the oral presentations. The WA COR will provide the contractor with a copy of the ESD's Report Style Guidelines. These guidelines shall be used to write all components of the evaluation report. In addition, the contractor shall use the ESD Report Cover provided by the WA COR when preparing the final report.
- 4-4 ORAL PRESENTATIONS (INCOMPLETE) The contractor shall be prepared to make at least one oral presentation of the information at a date, time, and location to be specified by the WA COR in a TD. The location will most likely be Philadelphia, PA. Additional presentations may also occur in Washington, DC and/or Richmond, VA. The contractor shall prepare appropriate briefing materials, specifically, a power point briefing for the oral presentation.
- 4-5 FACTSHEET (INCOMPLETE) The contractor shall develop a fact sheet summarizing the evaluation purpose, questions, methodology, results and recommendations. The WA COR will provide the contractor with a copy of a fact sheet template 7 calendar days after completion of the Final Report.
- 4-6 EVALUATION RECOMMENDATION TAXONOMY FORM (INCOMPLETE) The EPA will use this form to categorize each recommendation the contactor develops for the final report. The contractor shall complete the Evaluation Recommendation Taxonomy Form by providing each recommendation for the given evaluation, its proposed evaluation recommendation category, its direct environmental impact, and any additional comments the contractor may have. The list of the evaluation recommendation categories is located on the form for reference purposes. The form will in no way influence the contents of the report or briefings. The WA COR will provide the contractor with a copy of the Evaluation Recommendation Taxonomy Form. The contractor shall complete the taxonomy form 7 calendar days after the final report is completed.

Deliverables and Schedule Under Task 4

4-1	Report Outline	In accordance with the evaluation methodology schedule approved by the COR in task 2-5b.
4-2	Draft report	In accordance with the evaluation methodology schedule approved by the COR in task 2-5b.
4-3	Final report	14 calendar days after receipt of comments on the draft report and oral presentations.

4-4	Oral presentation	To be scheduled by the WA COR
4-5	Fact Sheet	7 calendar days after completion of Final Report
4-6	Evaluation Recommendation Taxonomy	7 calendar days after the final report is completed.

	Table 1: Summary of Deliverables and Dates								
Task	Deliverable	Due Date							
Task 1 P	repare Work plan								
la	Work plan	Within 15 calendar days of receipt of work assignment							
1b	Revised work plan	Within 7 calendar days of receipt of comments from CO							
Task 3 Inf	ormation Gathering and Ana	ılysis							
3-2	Discussion of Data Compilation, Analysis and Presentation Plan	In accordance with Methodology Schedule approved in Task 2-5b							
Task 4 Rej	port								
4-1	Report Outline	In accordance with Methodology Schedule approved in Task 2-5b							
4-2	Draft Report	In accordance with Methodology Schedule approved in Task 2-5b							
4-3	Final Report	14 calendar days after receipt of comments on Draft Report from WA COR							
4-4	Oral Presentations	To be scheduled by the WA COR							
4-5	Fact Sheet	7 calendar days after completion of Final Report							
4-6	Evaluation Recommendation	3 calendar days after completion of the Final Report							

Taxonomy Form	

United States Environmental Protection Agency Washington, DC 20460 Work Assignment Number 3-34								
EPA	Work A	ssignm	ent		Other	X Amendr	nent Number:	
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Contract Number	Contract Period 11	/19/2009	To 09/19/	2014	Title of Work Assign	ment/SF Site Nari	ne	
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Work Assignment Form. (WebForms v1.0)								

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Work Assignment Form (Wabhoring v. 0)

EDA		United States Environmental Protection Agency Washington, DC 20460					Work Assignment Number 3-34		
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Work Plan Approv		1			From 09/20/1	2012 To 03,	/31/2013		
The purpose of this amendme in the attached, revised WA	Comments: The purpose of this amendment to Work Assignment (WA) 3-34 is to increase the level of effort to 99 hours as provided in the attached, revised WA Statement of Work and to extend the WA period of performanc to March 31, 2013. The contractor shall submit a work plan and budget estimate in accordance with the contract.								
Superfund	Acco	unting and Appro	priations Data			Х	Non-Superfund		
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Project Officer Name Cheryl R.	Brown	3		Bran	ch/Mail Code:				
Phone Number: 202-566-0940									
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Other Agency Official Name				Bran	ch/Mail Code:				
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Work Assignment Statement of Work-Amended

Title: Evaluating the Effectiveness of VADEQ's Risk-Based Inspection Strategy

Contractor: IEc, Inc. Contract No.: EP-W-10-002

Work Assignment Number: 3-34

Phase 2:

Estimated Period of Performance Issuance to March 31 2013

Amended Level of Effort: 99 hours

Key EPA Personnel:

Work Assignment COR (WA COR): Britta Johnson

OP-OSEM-ESD 1807T

202-566-1465 202-566-2211

Contract Level COR: Cheryl R. Brown

CMG/OP (1805T) 202/566-0940 202/566-3001 (fax)

BACKGROUND AND PURPOSE:

Located within the Office of Policy (OP)'s Office of Strategic Environmental Management is the Evaluation Support Division (ESD). ESD's mission is to build the capacity of EPA staff and managers to conduct program evaluation activities throughout the Agency by providing technical support and training on program evaluation for EPA's national programs and regional offices. A crucial component in assessing the benefit of meeting goals, objectives, and sub-objectives is having measurable results.

As part of its effort to encourage the effective use of program evaluations throughout the Agency, ESD promotes program evaluation through a Program Evaluation Competition (PEC or Competition). This Competition is part of an ongoing, long-term effort to help build the capacity of headquarters and regional offices to evaluate activities and to improve measures of program performance. This program evaluation project was chosen for support under the current Program Evaluation Competition sponsored by OP.

AMENDMENT PUROPSE:

The purpose of this amendment is to allow additional comments from EPA and to develop a separate deliverable that can guide EPA and Virginia Department of Environmental Quality's (VADEQ) communications surrounding the findings and

1.

recommendations.

Quality Assurance (QA) Requirements

Check [] Yes or [X] NO, if the following statement is true or false. The Contractor shall submit a written Quality Assurance Project Plan for any project that is developing environmental measurements or a Quality Assurance Supplement to the Quality Management Plan for any project which generates environmental data using models with their technical proposal.

TASKS AND DELIVERABLES:

The work assignment (WA) Contracting Officer Representative (COR) will review all deliverables in draft form and provide revisions and/or comments to the contractor. The contractor shall prepare the final deliverables incorporating the WA COR's comments.

Contractor personnel shall at all times identify themselves as Contractor employees and shall not present themselves as EPA employees. Furthermore, they shall not represent the views of the U.S. Government, EPA, or its employees. In addition, the Contractor shall not engage in inherently governmental activities, including but not limited to actual determination of EPA policy and preparation of documents on EPA letterhead.

TASK 1: PREPARE WORKPLAN

The contractor shall prepare a workplan within 15 calendar days of receipt of a work assignment signed by the Contracting Officer (CO). The workplan shall outline, describe and include the technical approach, resources, timeline and due dates for deliverables, a detailed cost estimate by task and a staffing plan. The WA COR and the Contract Level COR and the CO will review the workplan. However, only the CO can approve/ disapprove the workplan. The contractor shall prepare a revised workplan incorporating the Contracting Officer's comments, if required.

Deliverables and Schedule Under Task 1

1a. Workplan1b. Revised workplan

Within 15 calendar days of receipt of work assignment. Within 7 calendar days of receipt of comments from the

CO, if required.

NOTE REGARDING WORK ASSIGNMENT DELIVERABLES AND TECHNICAL DIRECTION:

The Work Assignment Contracting Officer's Representative (COR) is authorized to issue technical direction (TD) under this work assignment. The COR will follow-up all oral technical direction in writing within 5 days.

TASK 2: DOCUMENT REVIEW AND DESIGN METHODOLOGY

1...

REMAINS UNCHANGED

Phase II includes Tasks Task 3 and 4.

TASK 3: INFORMATION GATHERING AND ANALYSIS

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]

REMAINS UNCHANGED

Deliverables and Schedule Under Task 3

Remains Unchanged

TASK 4: REPORTS

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)] All other tasks under this Task remains unchanged

- DRAFT REPORT. In accordance with the evaluation methodology schedule, the contractor shall submit a draft report containing, the compilation, analysis, and presentation of information developed and gathered during the conduct of the evaluation. Specifically, the contractor shall include information obtained or developed in support of Tasks 2-1 through 3-2. For purposes of costing, the contractor shall assume that a sequence of a draft preliminary findings memorandum and two separate draft reports will be required. Under the amended WA, the contractor shall incorporate the additional comments received on the draft from EPA Region 3, OECA, ESD and VADEO.
- 4-7 COMMUNICATIONS GUIDE. The contractor shall coordinate with EPA to develop a document summarizing the RBIS program, the purpose of the evaluation, questions addressed in the report and areas where further analysis is warranted. The WA COR will coordinate with the contractor to develop content for the guide.

All other information under this task remains unchanged.

Deliverables and Schedule Under Task 4

4-7 Communications Guide

14 calendar days after completion of the Final Report

EPA		shington, DC 2	0460	Work Assignment Number 3-34				
	Work	(Assignn	1ent		Other Amendment Number:			
Contract Number	Contract Period	11/19/200	9 Ta ()9/19/	/2014	Title of Work Assign	ment/SF Site Nam	ne	
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Superfund		Accounting and	Appropriations Da	ta	•	X	Nan-Superfund	
SFO (Mex 2)	Note: To report addition	nal accounting and	appropriations date use	e EPA Form 190	00-69A.			
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					000003		
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Work Assignment Form. (Web Forms v1.0)

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Work Assignment Form. (WebForms v1.0)

Work Assignment Statement of Work-Amended

Title: Evaluating the Effectiveness of VADEQ's Risk-Based Inspection Strategy

Contractor: IEc, Inc. Contract No.: EP-W-10-002

Work Assignment Number: 3-34

Phase 2:

Estimated Period of Performance Issuance to September 19, 2013

Amended Level of Effort: 75 hours

Key EPA Personnel:

Work Assignment COR (WA COR): Britta Johnson

OP-OSEM-ESD 1807T

202-566-1465 202-566-2211

Contract Level COR: Cheryl R. Brown

CMG/OP (1805T) 202/566-0940 202/566-3001 (fax)

BACKGROUND AND PURPOSE:

Located within the Office of Policy (OP)'s Office of Strategic Environmental Management is the Evaluation Support Division (ESD). ESD's mission is to build the capacity of EPA staff and managers to conduct program evaluation activities throughout the Agency by providing technical support and training on program evaluation for EPA's national programs and regional offices. A crucial component in assessing the benefit of meeting goals, objectives, and sub-objectives is having measurable results.

As part of its effort to encourage the effective use of program evaluations throughout the Agency, ESD promotes program evaluation through a Program Evaluation Competition (PEC or Competition). This Competition is part of an ongoing, long-term effort to help build the capacity of headquarters and regional offices to evaluate activities and to improve measures of program performance. This program evaluation project was chosen for support under the current Program Evaluation Competition sponsored by OP.

AMENDMENT PUROPSE:

The purpose of this amendment is to allow additional comments from EPA and to develop a separate deliverable that can be used by EPA to generate discussions around the emerging priority of Evidence Based Enforcement.

1.

Quality Assurance (QA) Requirements

Check [] Yes or [X] NO, if the following statement is true or false. The Contractor shall submit a written Quality Assurance Project Plan for any project that is developing environmental measurements or a Quality Assurance Supplement to the Quality Management Plan for any project which generates environmental data using models with their technical proposal.

TASKS AND DELIVERABLES:

The work assignment (WA) Contracting Officer Representative (COR) will review all deliverables in draft form and provide revisions and/or comments to the contractor. The contractor shall prepare the final deliverables incorporating the WA COR's comments.

Contractor personnel shall at all times identify themselves as Contractor employees and shall not present themselves as EPA employees. Furthermore, they shall not represent the views of the U.S. Government, EPA, or its employees. In addition, the Contractor shall not engage in inherently governmental activities, including but not limited to actual determination of EPA policy and preparation of documents on EPA letterhead.

TASK 1: PREPARE WORKPLAN

The contractor shall prepare a workplan within 15 calendar days of receipt of a work assignment signed by the Contracting Officer (CO). The workplan shall outline, describe and include the technical approach, resources, timeline and due dates for deliverables, a detailed cost estimate by task and a staffing plan. The WA COR and the Contract Level COR and the CO will review the workplan. However, only the CO can approve/ disapprove the workplan. The contractor shall prepare a revised workplan incorporating the Contracting Officer's comments, if required.

Deliverables and Schedule Under Task 1

1a. Workplan

Within 15 calendar days of receipt of work assignment.

1b. Revised workplan

Within 7 calendar days of receipt of comments from the

CO, if required.

NOTE REGARDING WORK ASSIGNMENT DELIVERABLES AND TECHNICAL DIRECTION:

The Work Assignment Contracting Officer's Representative (COR) is authorized to issue technical direction (TD) under this work assignment. The COR will follow-up all oral technical direction in writing within 5 days.

TASK 2: DOCUMENT REVIEW AND DESIGN METHODOLOGY

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10-11)]

REMAINS UNCHANGED

Phase II includes Tasks Task 3 and 4.

TASK 3: INFORMATION GATHERING AND ANALYSIS

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]

REMAINS UNCHANGED

Deliverables and Schedule Under Task 3

Remains Unchanged

TASK 4: REPORTS

[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10-11)] All other tasks under this Task remains unchanged

- DRAFT REPORT. In accordance with the evaluation methodology schedule, the contractor shall submit a draft report containing, the compilation, analysis, and presentation of information developed and gathered during the conduct of the evaluation. Specifically, the contractor shall include information obtained or developed in support of Tasks 2-1 through 3-2. For purposes of costing, the contractor shall assume that a sequence of a draft preliminary findings memorandum and two separate draft reports will be required. Under the amended WA, the contractor shall incorporate the additional comments received on the draft from EPA Region 3, OECA, ESD and VADEQ.
- 4-8 STATISTICAL TARGETING PAPER. Based on the findings of the evaluation, the contractor shall coordinate with EPA to develop a document outlining how statistical targeting either before or during the pilot could be used in similar projects. The WA COR will coordinate with the contractor to develop the themes such a paper would stress.

All other information under this task remains unchanged.

Deliverables and Schedule Under Task 4

4-8 Statistical Targeting Paper

To be scheduled by the WA COR

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Work Assignment Form (WebForms.vt.0)

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